

**IN THE UNITED STATES DISTRICT
COURT FOR THE EASTERN DISTRICT
OF TEXAS SHERMAN DIVISION**

EDWARD BUTOWSKY, in his
personal and professional capacities,

Plaintiff,

v.

MICHAEL ISIKOFF, ELLEN
RATNER, and VERIZON
COMMUNICATIONS, INC.,

Defendants.

Case No. 4:20-cv-00542-ALM

JURY DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS
VERIZON COMMUNICATIONS, INC. AND MICHAEL ISIKOFF TO ANSWER,
MOVE, OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants Verizon Communications, Inc. (“Verizon”) and Michael Isikoff (“Isikoff”) (collectively “Defendants”) respectfully move the Court to extend the time for Defendants to answer, move, or otherwise respond to Plaintiff’s Complaint, up to and including October 9, 2020. Plaintiff does not oppose this motion.

Plaintiff filed his Complaint on July 14, 2020. The current deadline for Verizon to answer, move, or otherwise respond to the Complaint is August 12, 2020. There is a dispute as to the effectiveness of service of the Summons and Complaint on Mr. Isikoff, but Mr. Isikoff has agreed to waive service defects consistent with this Motion.

Defendants seek this extension to more fully evaluate the parties’ claims and defenses, and not for purposes of delay. Plaintiff does not oppose Defendants’ extension request and

Defendants agree that they will not challenge the sufficiency of service of the summons upon them. The parties agree that, by entering into this agreement, Defendants will not waive any defenses including, but not limited to, the defenses contained within Fed. R. Civ. P. 12(b). This is Defendants' first request for an extension of time to respond to Plaintiff's Complaint.

Accordingly, Defendants respectfully request that the Court extend Defendants' time to answer, move, or otherwise respond to Plaintiff's Complaint up to and including October 9, 2020. A proposed order is attached.

Dated: August 10, 2020

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Counsel for Defendants Verizon Communications, Inc. and Michael Isikoff

CERTIFICATE OF CONFERENCE

This is to certify that on July 30, July 31 and August 3, 2020, counsel for Defendants and Plaintiff conferred by e-mail regarding the relief requested in this motion. Counsel for Defendants confirmed that Plaintiff does not oppose this motion.

/s/ Jean-Paul Jassy
Jean-Paul Jassy

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing on August 11, 2020, via the Court's CM/ECF system.

/s/ Ty Clevenger
Ty Clevenger